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*Attorneys for Kefer Funches*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
Kefer Funches,  
  
Defendant.

CASE NO. 2:24-cr-64-RFB-EYJ-1

STIPULATION TO EXTEND DEADLINE  
FOR REPLY TO GOVERNMENT  
RESPONSE (ECF NO. 226)

The United States of America, by Steven J. Rose, Assistant United States Attorney; and Defendant Kefer Funches, by his counsel of record, Kathleen Bliss and S. Alex Spelman, stipulate to a two-week extension of the deadline for filing a reply brief to the government's response (ECF No. 226). The parties show the Court as follows:

1. On April 25, 2025, the government timely filed its response to defendant's motion to suppress (ECF No. 216) and joinder by defendant Tyrone Patterson (ECF No. 217).
2. The deadline for a reply is May 2, 2025.
3. Counsel for defendant Funches have scheduling conflicts during the weeks of April

1 28, 2025, and May 5, 2025, which make it difficult to review the government's  
2 response, consult with their expert witness and file a meaningful reply on defendant  
3 Funches' behalf.

- 4 4. Specifically, Mr. Spelman commences a one-week trial on April 28, 2025, in *Gray v.*  
5 *Haas*, A-23-874285-C, before the Honorable District Court Judge Anna Albertson. A  
6 jury has been selected and opening statements begin on April 29, 2025. Trial is not  
7 expected to conclude until May 2, 2025.  
8  
9 5. Ms. Bliss must prepare and appear for an evidentiary hearing on May 1, 2025, in  
10 *Alexander v. Chadwick*, 2:22-cv-1084-CDS-NJK, a complex civil case. The  
11 following week, she has medical appointments in Arizona.  
12  
13 6. The government stipulates to a continuance of two weeks, from the deadline of May  
14 2, 2025, to a deadline of May 16, 2025.

15 Dated this 28th day of April 2025.

16 Respectfully submitted,

17  
18 Kathleen Bliss  
19 /s/ Kathleen Bliss, Esq.

Segal Chattah  
United States Attorney

20  
21 S. Alex Spelman  
22 s/s S. Alex Spelman, Esq.

Steven J. Rose  
/s/ Steven J. Rose

23 Attorneys for Kefer Funches  
24  
25

26 **CERTIFICATE OF SERVICE**

27 In accordance with Rule 49(c) of the Federal Rules of Criminal Procedure and Rule 47-1  
28 of the Local Rules of Practice for the United States District Court for the District of Nevada, I

1 certify that I am an attorney of counsel at Kathleen Bliss Law PLLC, and that on 28<sup>th</sup> day of  
2 April 2025, I did cause a true and correct copy of:

3 **STIPULATION TO EXTEND DEADLINE**

4 to be served via the Electronic Filing System in this action.  
5

6  
7 By: Kathleen Bliss  
Kathleen Bliss Law PLLC  
8

9 **ORDER**

10 THE COURT FINDS, that based upon the STIPULATION of the parties and for GOOD  
11 CAUSE SHOWING, the Court extends the deadline for defendant's reply from May 2, 2025, to  
12 May 16, 2025.  
13

14 Dated: April 30, 2025  
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17 RICHARD F. BOULWARE II  
18 UNITED STATES DISTRICT JUDGE  
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